

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Albert Russo CN 4853 Trenton, NJ 08650 (609) 587-6888 Standing Chapter 13 Trustee	
In re:  Frances M. Taylor Robert Z Taylor   <div style="text-align: right;">Debtor(s)</div>	Case No. 18-25876 / KCF  Hearing Date: November 28, 2018 10:00 am  Judge: Kathryn C. Ferguson  Chapter: 13

**TRUSTEE'S OBJECTION TO DEBTOR(S) CHAPTER 13 PLAN**

Albert Russo, Standing Chapter 13 Trustee, objects to the Debtor(s) Plan for the following reason(s):

- 1) Must provide a copy of TD Bank Savings account for current quarter of 2018. 2)  
Need copy of auto insurance renewal.**

**The debtor(s) is not paying all disposable income into the plan pursuant to either Schedules I & J or Form 22C based upon the Trustee's review of the income and tax returns provided. The Trustee's calculations are higher for the following reason(s): Income verifies higher on Schedule I. Net income is \$1,042.80. Plan length may be shortened.**

**The Plan provides for payment on unsecured claims of less than that which would be distributed upon liquidation under Chapter 7, as prohibited by 11 U.S.C. § 1325(a)(4): There is \$2000 equity in 2011 Ford F150 and \$1000 equity in 2000 Subaru and \$15,571.06 in TD Bank Savings Account. Plan must remain 100%.**

- 1) Must amend the Disclosure Statement to pay fees through the plan.  
2) Must resolve estimated IRS priority and unsecured claims**

WHEREFORE, Standing Chapter 13 Trustee, Albert Russo, objects to confirmation of the plan.

/s/ Albert Russo

Albert Russo  
 Standing Chapter 13 Trustee  
 by: Mary Krieger, Staff Attorney